



TOWN OF MILLINOCKET
WASTEWATER TREATMENT FACILITY
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March 10, 2010

Tom Danielson, Biologist II
Biological Monitoring Unit
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Subject: Chapter 583 Nutrient Criteria.

Dear Mr. Danielson,

As you know we are the first discharger after the presently idle Katahdin Paper Co. on the Penobscot River. We believe the proposed rule for phosphorus limits will be unattainable at different times through the monitoring season.

We have a three pond facultative lagoon system which was not built to remove phosphorus. This would mean the town of Millinocket having to spend between 3 and 4 million dollars to upgrade, and then only possibly be able to remove phosphorus at the proposed limits. As you know this would be considered an unfunded mandate which seem to be flowing freely lately. The town of Millinocket is not in a financial position to be able to do such a large upgrade. With the down turn in the economy the money is just not there.

Also in section 6 A. stating that treatment facilities would be responsible for ambient monitoring, is unacceptable. The regulated community should not be responsible for ambient monitoring. There are many sources of nutrient loadings to the Penobscot River. The direct dischargers are only a small source of loadings in most cases. Nonpoint sources such as storm water runoff, lawn care and farming practices, failing or crowded septic systems, and impoundments all add to the nutrient enrichment problems.

We hope that the Department of Environmental Protection will hold off on the rule making until more reasonable limits are adopted.

Thank you.

Respectfully,

James Charette, Chief Operator
Millinocket Wastewater Treatment Facility

Cc. Eugene Conlogue, Town Manager
Tanya Hovell, Inspector ME. DEP.